

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DORAL BANK OF PUERTO RICO, on  
behalf of itself and all others similarly  
situated,

Plaintiff,

v.

WASHINGTON MUTUAL ASSET  
ACCEPTANCE CORPORATION, et al.,

Defendants.

No. 09-1557 (MJP)

**STIPULATION AND [PROPOSED]  
ORDER REGARDING DEADLINE  
TO RESPOND TO AMENDED  
COMPLAINT**

Note on Motion Calendar:  
March 2, 2010

**I. STIPULATION**

Plaintiff Doral Bank of Puerto Rico, defendant The McGraw-Hill Companies, Inc. (“McGraw-Hill”), and defendant Moody’s Investors Service, Inc. (“Moody’s”) hereby stipulate and agree that McGraw-Hill and Moody’s shall answer or otherwise respond to Plaintiff’s Amended Complaint by the later of:

- (i) 30 days after the date on which the Court issues an order appointing a Lead Plaintiff; or
- (ii) if the Lead Plaintiff files a consolidated amended complaint, 30 days after the filing of the consolidated amended complaint.

1 Stipulated and agreed this 2<sup>nd</sup> day of March, 2010.

2 TOUSLEY BRAIN STEPHENS PLLC

RIDDELL WILLIAMS P.S.

3  
4 By: /s/ Nancy A. Pacharzina  
Kim D. Stephens, WSBA No. 11984  
5 Nancy A. Pacharzina, WSBA No.  
25946  
6 1700 Seventh Avenue, Suite 2200  
Seattle, WA 98101  
7 Tel: 206-682-5600  
Fax: 206-682-2992  
8 kstephens@tousley.com  
npacharzina@tousley.com

9 Attorneys for Plaintiff

By: /s/ Paul J. Kundtz  
Paul J. Kundtz, WSBA #13548  
Gavin W. Skok, WSBA #29766  
1001 Fourth Avenue  
Suite 4500  
Seattle, Washington 98154-1192  
Tel: 206-624-3600  
Fax: 206-389-1708  
pkundtz@riddellwilliams.com  
gskok@riddellwilliams.com

Attorneys for Defendant  
The McGraw-Hill Companies, Inc.

11 LANE POWELL PC

12  
13 By: /s/ Larry S. Gangnes  
Larry S. Gangnes, WSBA #8118  
14 1420 Fifth Avenue, Suite 4100  
Seattle, Washington 98101-2338  
15 Tel: 206-223-7036  
Fax: 206-223-7017  
16 gangnesl@lanepowell.com

17 Attorneys for Defendant  
Moody's Investors Service, Inc.

## 18 19 20 21 II. [PROPOSED] ORDER

22 Pursuant to the above Stipulation, IT IS SO ORDERED.

23  
24  
25 Honorable Marsha J. Pechman  
26 United States District Judge

CERTIFICATE OF SERVICE

Donna Hammonds, declares as follows:

I am over 18 years of age and a citizen of the United States. I am employed as an executive assistant by the law firm of Riddell Williams P.S. On the date noted below, I electronically filed the foregoing document using the CM/ECF system which will notify the following:

**James J. Coster**  
[jcoster@ssbb.com](mailto:jcoster@ssbb.com), [managingclerk@ssbb.com](mailto:managingclerk@ssbb.com), [jregan@ssbb.com](mailto:jregan@ssbb.com)

**Larry Steven Gangnes**  
[gangnesl@lanepowell.com](mailto:gangnesl@lanepowell.com), [sebringl@lanepowell.com](mailto:sebringl@lanepowell.com), [docketing-sea@lanepowell.com](mailto:docketing-sea@lanepowell.com), [donnelyjoss@lanepowell.com](mailto:donnelyjoss@lanepowell.com)

**Christopher M. Huck**  
[Christopher.huck@dlapiper.com](mailto:Christopher.huck@dlapiper.com), [karen.hansen@dlapiper.com](mailto:karen.hansen@dlapiper.com)

**Stellman Keehnel**  
[stellman.keehnel@dlapiper.com](mailto:stellman.keehnel@dlapiper.com), [patsy.howson@dlapiper.com](mailto:patsy.howson@dlapiper.com)

**Joel P. Laitman**  
[jlaitman@cohenmilstein.com](mailto:jlaitman@cohenmilstein.com)

**Christopher E. Lometti**  
[clometti@cohenmilstein.com](mailto:clometti@cohenmilstein.com)

**Bradley T. Meissner**  
[bradley.meissner@dlapiper.com](mailto:bradley.meissner@dlapiper.com)

**Nancy A. Pacharzina**  
[npacharzina@tousley.com](mailto:npacharzina@tousley.com), [kzajac@tousley.com](mailto:kzajac@tousley.com)

**Daniel B. Rehns**  
[drehns@cohenmilstein.com](mailto:drehns@cohenmilstein.com)

**Kenneth M. Rehns**  
[krehns@cohenmilstein.com](mailto:krehns@cohenmilstein.com)

**Rogelio Omar Riojas**  
[omar.riojas@dlapiper.com](mailto:omar.riojas@dlapiper.com), [nina.marie@dlapiper.com](mailto:nina.marie@dlapiper.com)

**Joshua M. Rubins**  
[jrubins@ssbb.com](mailto:jrubins@ssbb.com), [managingclerk@ssbb.com](mailto:managingclerk@ssbb.com), [jregan@ssbb.com](mailto:jregan@ssbb.com)

1 **Kim D. Stephens**


2 kstephens@tousley.com, kzajac@tousley.com,  
3 cbonifaci@tousley.com

4 **Steven J. Toll**

5 stoll@cohenmilstein.com, efilings@cohenmilstein.com

6 I declare under penalty of perjury under the laws of the State of Washington  
7 that the foregoing is true and correct.

8 DATED this 2<sup>nd</sup> day of March, 2010.

9   
10 Donna Hammonds